

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

GREATER ST. LOUIS CONSTRUCTION)	
LABORERS WELFARE FUND, et al.,)	
)	
Plaintiffs,)	
)	
v.)	Cause No.: 4:08-CV-509 RWS
)	
HANCOCK DEMOLITION &)	
EXCAVATION CO., LLC,)	
)	
Defendant.)	

**MOTION FOR A CREDITOR’S BILL IN EQUITY
AND TO PIERCE THE CORPORATE VEIL**

Pursuant to Rule 69(a) of the Federal Rules of Civil Procedure and pursuant to the established procedures of the State of Missouri relating to proceedings in aid of execution, plaintiffs move the Court for equitable relief in the form of a creditor’s bill, to allow plaintiffs to proceed to satisfy the judgment entered in this case from the property of Hancock Demolition & Excavation Co., LLC, which is not subject to execution by normal means available at law.

Previously, this Court held that C&H Construction and Excavation, LLC and Clarence Hancock were the alter egos of Hancock Demolition & Excavation Co., LLC. Plaintiffs move the court to again pierce the corporate veil of Hancock Demolition & Excavation Co., LLC, C&H Construction and Excavation, LLC and Clarence Hancock, and permit the plaintiffs to satisfy the judgment from their alter ego, TA&H Construction and Excavation, LLC.

Plaintiffs have no adequate legal remedy. Further grounds supporting the use of a creditor's bill and piercing the corporate veil are set forth in the accompanying memorandum of law.

Respectfully submitted,

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/s/ Michael A. Evans
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Attorneys for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on March 2, 2012 the foregoing was filed electronically with the Clerk of the Court and mailed to: Hancock Demolition, 6637 Thurston, St. Louis, MO 63134; Clarence Hancock, 6637 Thurston, St. Louis, MO 63134; C&H Construction and Excavation, LLC, 6637 Thurston, St. Louis, MO 63134; TA&H Construction and Excavation, LLC, 60 Reasor Dr., St. Louis, MO 63135; TA&H Construction and Excavation, LLC, 2865 Hamilton, St. Louis, Missouri 63112.

/s/ Michael A. Evans